Attachment B

General Business and Ownership Information Questions

1. Specify the full legal name(s) with exact spelling, the business mailing address, telephone number, and address(es) of each entity's operations for each of the following:

   - Bird Incorporated;
   - CertainTeed Corporation;
   - Saint-Gobain Abrasives, Inc.;
   - Saint-Gobain Ceramics & Plastics, Inc., and
   - Saint-Gobain Containers, Inc. aka Verallia North America

   (each a "Saint-Gobain Company" and, collectively, the "Saint-Gobain Companies").

   For each Saint-Gobain Company above: if incorporated, specify the state of incorporation and the principal place of business; if a partnership, provide the names and addresses of all of the partners; if a limited liability company, provide the names and addresses of all of the members; if any of the above listed entities has a parent company, list the parent name and address; and provide the name and title of the individual who is responsible for the entity's compliance with environmental laws and regulations.

2. Provide a chart/diagram that illustrates the corporate and management structure of the Saint-Gobain Companies, including parent companies, subsidiaries, and affiliated entities that do business in New Hampshire, Vermont, Maine, Massachusetts, Connecticut and Rhode Island ("New England"). Identify who has responsibility for environmental compliance within each organization.

3. Provide a list of all entities affiliated with Saint-Gobain North America that do business in New England. For each such entity, specify:

   - the full legal name(s);
   - business mailing address;
   - telephone number;
   - any other addresses where each such entity does business;
   - if incorporated, specify the state of incorporation;
   - if a partnership, provide the names and addresses of all partners;
   - if a limited liability company, provide the names and addresses of all members;
   - if a parent company exists, provide the parent company's name and address;
   - the date that the entity became affiliated with Saint-Gobain North America; and

- provide a brief description of products manufactured or produced at each facility since September 2009.

4. From September 1, 2009 to the present, provide a separate response to the following questions for each of the manufacturing facilities located at 1077 Pleasant Street, Norwood, Massachusetts (the "Norwood Facility"), 1 National Street, Milford, Massachusetts (the "Milford Facility"), and 1 New Bond Street, Worcester, Massachusetts (the "Worcester Facility"):

   a. General Process Wastewater Discharge Questions:

      (1) Identify all unit operations[1] that generate process wastewaters.

      (2) For each unit operation that generates process wastewaters, provide an estimated or actual daily maximum and monthly average flow rate (in gallons) for each discharge. If flow rates are estimated, provide the assumptions used and rationale.

      (3) Provide a copy of all permits issued for process and/or combined stormwater wastewater discharges and analytical discharge results. Results shall be provided in chronological order using tabular format and organized by outfall.

      (4) Describe all pollution control equipment (i.e., settling tanks and reactors, catch basins and sedimentation or filtering media, oil and grit chambers, etc.) along the wastewater's flow path from the source to the discharge point.

      (5) For each identified unit operation that generates a process wastewater, show on a site diagram the exact location and drainage area on the property where the operation is conducted. In addition, explain and show the hydrological path for flows from the unit operation to the discharge point; include/show along the flow path from the source to the discharge point any pipes and manholes, culverts and ditches, basins and outfall structures, tanks and pumps, etc.

      (6) Explain in detail, and show on the site diagram, all locations where there was, or continues to be, an actual or potential for process wastewaters to discharge to surface waters.

[1] *For the purpose of this letter, an "operation" is a complete manufacturing or individual industrial process such as, but not limited to, equipment cleaning and rinsing, material contact and noncontact cooling, metal plating and finishing, painting, wastewater and water treatment and/or recycling, stockpile drag-out and residual fluids draining, building and floor washing, floor drain, piping and trench cleaning, etc.*

(7) If there have been any modifications or changes to process wastewater flows and/or pollution control equipment, describe each modification in detail and include relevant dates. Also explain the reasons for the change and provide the total and itemized costs for the change(s).

b. General Stormwater Discharge Questions:

(1) Specify the date of application for stormwater permit coverage (Notice of Intent for industrial general permits, or application date for individual permit), date of permit authorization and/or issuance, and date of permit expiration for all stormwater permits.

(2) Provide a copy of each facility's current stormwater management plan (such as the Stormwater Pollution Prevention Plan ("SWPPP")), including all figures, tables, attachments, and appendices. State when the original plan was prepared and dates for all revisions in chronological order using tabular format.

(3) Provide the name(s) of each qualified person responsible for the implementation of the stormwater management plans. This includes, but is not limited to, personnel who possess the knowledge and skills to assess conditions and activities that could impact stormwater quality at the facility, and also those who can evaluate the effectiveness of control measures. Provide documentation that indicates the person(s) qualification, education, and training.

(4) The name of each person who conducts storm water inspections, monitoring, maintenance of Best Management Practices ("BMPs"), recordkeeping, and updating of the SWPPP. For each person listed, provide all employee training records relating to stormwaters, the person's title and responsibilities, period of employment, and whether the person is/was an employee or contractor.

(5) Provide the following stormwater discharge inspection documents and information in chronological order:

(i) *Annual Comprehensive Site Inspections*, as defined under Part 4.3 of EPA's October 28, 2008 Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (the "2008-MSGP") or equivalent inspections conducted by each facility, as applicable. If inspections have not been conducted and documented, explain why;

(ii) For each outfall, *Quarterly Outfall Visual Assessment Inspections*, as defined under Part 4.2 of the 2008-MSGP, or equivalent inspections conducted by each facility, as applicable.

If inspections have not been conducted and documented, explain why;

(iii) *Routine Facility Inspections*, as defined under Part 4.1 of the 2008-MSGP, or equivalent inspections conducted by each facility, as applicable. If inspections have not been conducted and documented, explain why;

(iv) *Corrective Action Reports*, as defined under Part 3.4 of the 2008-MSGP, or equivalent reports or records documenting actions taken or to be taken to address stormwater control measures and best management practice conditions.

(v) *Stormwater Analytical Monitoring Results* and applicable chain-of-custody forms. For each result, indicate from which facility and outfall the sample was collected. Please note nomenclature used to describe each outfall and be as specific as possible when providing a response for this question. Monitoring results shall be provided in chronological order for each facility and each outfall using tabular format.

(6) List and describe, in detail, all industrial activities[2] at each Facility; include the period of time and dates during which the activities occurred or continue to occur, and provide the following:

(i) State which industrial activities are exposed to stormwater. If the activity is not exposed to stormwater, describe the control measure(s)[3] which prevents the activity from being exposed, i.e., roof assembly, tarpaulin, fixed or portable structure, etc.

(ii) For industrial activities conducted outside, describe all specific control measures that were or are currently being used to minimize pollutant discharges in stormwaters. Include operation and maintenance schedules for each control measure.

(7) If there have been any corrective actions/changes to which industrial activities are exposed to stormwater and/or the activities' source control measures since EPA's inspection of the Facility, describe the conditions of the activity and control measures before and after each change and detail the

[2] *For the purpose of this letter, an "industrial activity" means the 10 categories of industrial activities included in the definition of "stormwater discharges associated with industrial activity" as defined in 40 CFR § 122.26(b)(14)(i)-(ix) and (xi), and includes, but is not limited to, dust collectors and bag houses, outdoor material storage, transfer, and manufacturing or processing activities, etc.*

[3] *Control measure refers to any Best Management Practice ("BMP") or other method used to prevent or reduce the discharge of pollutants to waters of the United States.*

reason why the change was made, the date(s) the change was identified, and the date the change was made. Also, provide estimated or actual itemized total costs (material and labor) to implement each change.

(8) In detail, list and describe each stormwater discharge to surface water or wetlands, and its ultimate discharge location. Name the receiving surface water or wetlands. If unknown, identify the unnamed surface water, and the nearest named surface water or wetland to which the unnamed water flows. If stormwater is not discharged directly to surface waters or wetlands (i.e., collected in a detention basin, swales, catch basins, or garage bays), describe the pathway of the stormwater flow including the immediate and ultimate destinations and the means of conveyance. If the discharge of stormwater has changed since EPA's inspection of the Facility, provide a description of the changes and include the period of time and dates when the discharge changed.

(9) Provide a detailed site diagram that meets the conditions set forth in Part 5.1.2 of the 2008-MSGP. The diagram shall clearly show and label:

(i) Industrial activities and materials which have exposure to stormwater;

(ii) Means by which stormwater flows off the site, i.e., pumped or gravity;

(iii) Provide an estimate or, if available, an actual volumetric flow rate (in gallons per month) from each discharge and the minimum rain storm intensity event(s) that will produce a stormwater discharge;

(iv) Drainage diversion and control structures (i.e., detention basins and catch basins, outfall structures and drainage swales, oil and water separators, etc.) in place to reduce pollutants discharged off the site;

(v) Surface waters and wetlands;

(vi) The location of each stormwater discharge and whether it reaches surface water or wetlands;

(vii) Industrial activities which generate process wastewaters and ultimate discharge location(s).

c. General Spill Prevention, Control and Countermeasures ("SPCC") Questions:

(1) Provide the aggregate shell capacity of all above ground oil tanks and containers equal to or greater than 55 gallons in size. Under 40 C.F.R. § 112.2, "oil" is defined as oil of any kind or in any form including, but not limited to, petroleum, fuel oil, sludge, oil refuse and oil mixed with wastes other than dredged spoil;

(2) Explain whether the facility is subject to the Oil Pollution Prevention regulations based on the thresholds set forth in 40 C.F.R. § 112.1(d)(1) (i.e., the SPCC-regulated underground oil storage capacity of a facility is greater than 42,000 gallons -or- the aboveground oil storage capacity of a facility is greater than 1,320 gallons), and the date the facility first started having the capacity to store oil above the SPCC regulatory threshold;

(3) If the facility is updating or has updated its Spill Prevention, Control and Countermeasure ("SPCC") Plan since EPA's inspection, include the following information:

(i) The cost of preparing the revised Plan;

(ii) The cost of implementing the Plan (including, but not limited to, the cost of constructing containment and the cost of conducting formal internal integrity and external inspections and testing);

(iii) The ongoing annual or periodic costs for implementing the Plan (including, but not limited to, training, inspections, testing, and record keeping).

5. The following are site-specific questions for the Norwood Facility and/or relate to observations made by EPA or information received during or following the November 27, 2012 inspection.

a. Describe the relationship between Bird Incorporated and CertainTeed Corporation, including the role and responsibilities of each entity with respect to operations and environmental compliance at the Norwood Facility.

b. Using the nomenclature in a facility site diagram entitled "NPDES Permit - Site Plan," dated December 21, 2012 and prepared by GZA, and a March 20, 2012 submission to EPA, state the exact date and circumstances on which all other outfalls, except Outfalls 001 through 004, were installed or created, and when they were identified or discovered by the facility. For outfalls not originally identified in the facility's March 20, 2012 response to EPA's Information Request, provide an explanation that details why the outfalls were not identified at that time.

c. The Facility's September 20, 2005 NPDES permit required the development and implementation of a SWPPP. State the date the facility's SWPPP was developed pursuant to that requirement, and provide a copy of the signature page required under Section 5.1.7 of the 2008-MSGP.

d. From September 2009 to the present, list all unit operations/sources that generate or have generated process wastewaters and were or are currently being discharged to surface waters, including any conveyances which drain to the town's stormwater sewer system. The list shall distinguish between sources that are permitted versus not permitted by the facility's September 20, 2005 NPDES permit, i.e., overflow waters from cooling tower tanks, wastewaters from latex paint process drainage troughs and pits, boiler blow down and condensate waters, etc., including unpermitted discharges identified in the Facility's March 20, 2012 response to EPA's Information Request. For each operation listed, identify the source and characteristics of the discharge, the ultimate discharge points, daily maximum and monthly average volumetric flow rate (in gallons), and the date each discharge started and (if applicable) stopped.

e. EPA inspectors were told by facility representatives that the treatment basin associated with Outfall 002 underwent renovation and, while undergoing renovation, wastewater from the basin was trucked to an area next to the Granule Plant for storage and disposal. Provide the following information about the renovation/work and the storage and disposal area:

(1) A statement describing the type of work performed on the basin, the name of the company(s) that did the work, and the date work started and stopped.

(2) Provide, if available, a copy of any local or state permits or approvals issued and/or applications filed to perform the work on the basin, and for the discharge of wastewaters from the basin.

(3) The total and itemized costs, including engineering costs, to renovate the basin.

(4) The reason(s) for performing the work.

(5) An explanation detailing the means by which wastewaters from the basin were managed and/or disposed of during basin work. Your explanation shall be accompanied by a site diagram showing the exact dimensions including location of any on-site storage areas. The diagram shall include topographical contour lines, drainage features, and flow lines showing run-off paths from the area to surface waters or wetlands. If any flow path has the potential to lead down gradient wetlands or surface waters, provide the name of each water body.

(6) Regarding the storage and disposal area, provide subsurface disposal and/or soil infiltration engineering calculations and/or other information to support the selected location and method for storage and disposal. If calculations or supporting information was not produced, provide a detailed response outlining the reasons for the storage and disposal area.

(7) Provide the total daily volume of wastewaters (in gallons) removed from the basin and placed in the storage and disposal area. Also provide dates the water was removed, and (if applicable) placed back into the basin.

(8) Provide copies of visual inspection reports, pictures, or other documentation associated with the storage and disposal area that addresses overland flow and/or runoff flows from the area, influence on infiltration rate and application rate due to various size precipitation events, visual observations, and passive or active controls measures for the prevention of surface runoff. Provide any additional information that supports the manner in which wastewaters and/or the area were managed to prevent wastewaters from discharging via surface flow outside of the designated or delineated disposal areas to nearby surface waters and/or wetlands.

(9) Indicate if wastewaters have ever flowed down-gradient to wetlands and/or surface waters from the storage and disposal areas. If so, provide the date and estimated volume (in gallons) released for each event and indicate the flow path on the diagram provided in your response to question 4.b.(9). Your response shall take into consideration, but is not limited to, temporal soil infiltration capacity/rates, wet weather events, and frozen weather conditions.

f. EPA inspectors were told by facility representatives that prior to the renovation, wastewaters associated with Outfall 002 discharged from the basin's concrete headwall and/or stone rip-rap spillway instead of the permitted outlet structure. Provide the following information:

(1) The date on which the facility discovered wastewaters were not discharging from the basin's permitted outlet structure, and the date on which the facility discovered that wastewater was discharging in the vicinity of the basin's headwall and spillway. Provide the name(s) of the person(s) who discovered each piece of information.

(2) Identify the date on which wastewater first started discharging from the headwall and spillway instead of the permitted outlet structure. If you do not know the actual date, provide an estimated date and the basis for that estimate.

(3) Explain the origin and cause for wastewaters not to discharge through the permitted outfall, but rather to discharge through the headwall and spillway.

(4) A copy of reports or notifications filed or submitted by the facility to EPA or the state about the matter. Also include any information received by the facility from the state or EPA about the matter.

(5) A copy of engineering evaluations and/or facility inspection reports or other documents relating to the condition and/or the performance of the basin and its features, i.e., walls and floor, headwall and spillway, outlet structure, piping and valves, seals, etc. If any of the documents identified required repair or work, provide the start and end dates for work and, if work has not been completed, state the reason(s) why and provide a schedule for completing the work.

g. In December 2006, April 2010, December 2011, January 2012, February 2012, and October 2012, total suspended solids ("TSS") sampling results reported to EPA for Outfall 002 were above the daily maximum and monthly average NPDES permit discharge limits of 30 milligrams per liter ("mg/l") and 20 mg/l, respectively. Provide the following information for each sampling report:

- the date of the sampling event;
- the exact location where samples were collected;
- method(s) used to collect the samples;
- time of sampling event in relation to start of a measurable storm event;
- the duration of the storm event;
- the name of the person(s) collecting the samples;
- the date the analysis was performed;
- the name of the person(s) performing the analysis;
- the analytical techniques/methods used; and
- chain-of-custody form.

h. Submit a complete copy of the SWPPP being implemented by the facility at the time of EPA's inspection, and any amendments or changes since EPA's inspection.

i. EPA inspectors observed oil sheen on the Neponset River from an area near the facility's cooling tower. By way of a December 17, 2012 letter, the facility informed EPA that it is gathering information on the possible source(s) of oil which caused the sheen, and will be developing a "plan of action" to mitigate oil migration into the river. Submit a copy of the plan of action and any information that has been gathered regarding the source(s) and quantity of oil released which caused the oil sheen. In addition, provide the following:

(1) Since EPA's November 27, 2012 inspection, provide a copy of any routine facility inspections and/or visual outfall inspections or surface water observation reports or documentation relating to oil entering/seeping into the Neponset River in the area near the cooling tower.

(2) Provide a statement which describes each instance in which the facility has observed and/or recorded visual oil sheen on the Neponset River's edge near the facility's cooling tower. For each such instance, provide the date(s), copy of documentation, and describe and document any course(s) of action taken.

(3) On November 30, 2011, a representative from EPA's permit program visited the facility and observed an oily sheen on the Neponset River's edge near the facility's cooling tower. Indicate if, following EPA's November 30, 2011 site visit, the facility initiated follow-up action. If your answer is affirmative, provide all documentation and records regarding the observation(s) and follow-up action(s).

j. Provide the source(s), and Material Safety Data Sheet(s) ("MSDS") and/or chemically characterize the spilled materials observed on and around dust collection and aggregate conveyor units at the Solaris Plant, shown in photographs 1 through 4 in Attachment B-1. Explain the reason for each spill, state the date on which the material was cleaned up, and detail any corrective actions taken to prevent future spills and pollutants in stormwaters in these areas.

k. On February 14, 2013, the facility submitted a revised SPCC Plan to EPA. EPA has reviewed the document and is offering comment and requesting the following information:

(1) Table 1 of the Plan lists and characterizes oil filled tanks/containers. For each tank or container listed (other than oil-filled portable tanks and operational equipment), provide the age and/or the date the tank was placed into service, i.e., when oil storage in the container commenced.

(2) Sections 1.5.2 and 1.5.3 of the Plan ("Environmental Equivalence – Integrity Test" and "Environmental Equivalence – Facility Security," respectively) are not applicable and may be removed from the Plan.

The industrial inspection and testing standards in Steel Tank Institutes Standard for the Inspection of Aboveground Storage Tanks SP001, September 2011, 5th Edition, Table 5.5, requires only Periodic Inspections for Category 1 shop-fabricated tanks and portable

containers, and, for certain shop-fabricated tanks, a Formal External Inspection is required every 20 years. Tanks that qualify as Category 1 under Table 5.5, do not require a schedule for internal integrity testing, and therefore equivalence is not applicable.

Regarding facility security, 40 C.F.R. § 112.7(g) does not specifically require fencing, and therefore equivalence is not applicable.

(3) Section 2.6.1 of the Plan indicates that the facility initiated internal integrity testing for certain tanks in 2012 and that work is anticipated to be completed by 2017. Provide a copy of the work schedule, list of tanks that have been or will be tested, scope of work for testing, any completed internal integrity testing and inspection reports, and an itemized list and total of actual or expected costs to conduct the work.

6. The following are site-specific questions for the Worcester Facility, and/or questions that relate to observations made by EPA or information received during or following the June 18, 2013 inspection.

   a. Submit a complete copy of the SWPPP and SPCC Plan being implemented by the facility at the time of EPA's inspection, including all figures, tables, attachments, and appendices, and any amendments since the inspection.

   b. EPA's inspectors were told by facility representatives that the facility has reduced, over the years, the number of employees whose duties include work relating to the facility's compliance with environmental laws and regulations. Since September 1, 2009, provide on an annual basis the total number of full- and part-time employees whose duties include environmental compliance tasks. If the total number of people has changed, indicate the reason(s).

   c. The Facility's NPDES permit requires that (a) all areas identified in the SWPPP be inspected at least on an annual basis; (b) a tracking or follow-up procedure is used to ensure appropriate response actions are taken; and (c) records of inspections and follow-up response actions are maintained for at least five years. Provide copies of all inspections (e.g., Storm Water Inspection Summary Reports) since September 2009 for all areas covered in the SWPPP. If reports were not prepared for certain time periods and areas, provide an explanation.

   d. Provide a description of the wood chipping operation being conducted by the Massachusetts Department of Conservation and Recreation ("DCR") and the United States Department of Agriculture ("USDA") on the facility's property. Include, at minimum, the date on which operations began and, if applicable, ended, the person responsible for the operation's activities, the types of stormwater control measures in place, the date they were installed and by whom, and the name of the person responsible for inspecting and maintaining the control measures and at what frequency.

e. Discharge Monitoring Report ("DMR") data for Outfalls SW4 and SW5 dated September 30, 2013 indicated that no samples were taken for "weather related" reasons. Explain why samples were not collected and what "weather related" means in this instance.

f. Submit copies of all storm water testing and visual observation results as well as laboratory analytical data stored electronically on the Greendale Environmental Organization folder, as referenced in Section 2.6.2 of the SWPPP.

g. By way of an October 7, 2013 correspondence, the facility listed corrective actions taken or expected to be taken in response to EPA's inspection. Provide the following:

(1) A progress report listing and detailing all stormwater and/or process wastewater corrective actions/changes implemented to date, and list all proposed/future changes, i.e., berms, metal chips storage and containment area, roofs, etc. For proposed changes that have not yet been fully implemented, submit a proposed schedule for implementation.

(2) Provide a statement that details which process and/or stormwater sewer lines have been tested for cross connections through dye testing or any other method, and which (if applicable) are expected to be tested in the future. For lines that have not yet been tested, submit a proposed testing schedule. Submit a brief statement which summarizes the results of testing for cross connections.

(3) Provide an updated version of the "Surface Water Drainage Map for Saint-Gobain Properties" (Attachment 4 to the Facility's SWPPP) that illustrates the location of all stormwater and process wastewater infrastructure, including but not limited to catch basins, storm drains, and piping. Specifically, the diagram shall illustrate the wastewater infrastructure collecting wastewater flows from the "FAM 1" process in Building 512, the stormwater wastewater drainage infrastructure on New Bond Street, and catch basins located on C Street.

(4) Submit a copy of any reports which detail suspected or discovered causes for NPDES permit limit excursions or results above benchmark values provided in the MSGP, including but not limited to elevated total copper, total zinc and/or total aluminum levels.

(5) Submit copy of any daily inspections of areas near roll-off waste containers and dust collectors instituted since EPA's inspection, and specify and submit:

(i) Steps taken to ensure inspections are being conducted, documented, and reported to management in a manner sufficient to identify potential problems which require corrective action.

(ii) Decision making process/method used by management to ensure appropriate corrective action measures are identified, listed, and completed.

(iii) Documentation of inspections for waste roll-off containers and dust collector units since EPA's inspection, as well as any correspondence which documents corrective action steps taken.

h. The "Pollution Control Equipment (External)" BMP in the Facility's SWPPP states that areas where dust collector fines and other process materials are deposited are periodically swept. Specify the frequency of sweeping, which areas are swept, and the person/party that does the sweeping.

i. Provide the source(s), Material Safety Data Sheet ("MSDS") and/or other information that details the chemical composition of materials observed by EPA, see photographs included in Attachment B-2.

(1) On the southwest side of Building 301, spilled material associated with A-Frame storage. Also provide the start and end date for storing A-Frames in the location, photographs 1 through 3.

(2) On the east side of Building 115 (Plant 7), spilled material around roll-off waste containers and a drain, photographs 4 through 7.

(3) On the south side of Building 115, on F Street, spilled material under a dust collection unit, and spilled waste metal chips and liquid machine cutting fluids, photographs 8 through 11.

(4) On the north side of Building 120, on E Street, spilled material under two dust collector units and collector bags, photographs 12 through 16.

(5) On C Street, spilled material around a roll-off waste container and a drain, photographs 17 through 21.

(6) Pavement area at Building 418, waste solids in two dust collector drums and a portable container below a dust collector unit, photographs 22 through 25.

(7) Indicate the source and ultimate discharge point for waters observed entering a storm drain next to the facility's 6,000 gallon oil tank. Provide an estimated or actual daily average flow rate (in gallons) for the source, photograph 26.

(8) On the west side of C Street, the waste material being stock piled outdoors in bays created using Jersey barriers, photographs 27 and 28.

7. The following are site-specific questions for the Milford Facility and/or questions that relate to observations made by EPA or information received during or following the September 17, 2013 inspection.

a. Describe the current status of the proposed sale of Verallia North America to the Ardagh Group, including when the transaction is expected to be completed and whether it includes operations at the Milford Facility. Describe the nature of the transaction, including whether the transaction consisted of a merger, consolidation, purchase, sale, or transfer of assets and whether the acquiring company retained the liabilities of the acquired company for events prior to the sale, and provide copies of all documents pertaining to any agreements, express or implied, for the purchasing entity to assume the liabilities of the acquired company, where applicable.

b. Submit a complete copy of the SWPPP being implemented by the facility at the time of EPA's inspection, including all figures, tables, attachments, and appendices, and any amendments or changes since EPA's inspection.

c. Wet Weather Visual Inspection reports available at the time of EPA's inspection documented inspections at outfalls as "001A," "001B," "003," "Storm Drain – Boiler Room," "Storm Drain – Propane Tank," "NCCW 003," "Storm Drain A," and "Storm Drain B." Indicate whether any of these identified outfalls refer to the same outfall monitoring locations, and provide a site diagram that shows the exact location of each of these outfall monitoring locations.

d. From September 1, 2009 to the present, provide a table that lists all effluent wastewater discharges to the municipal wastewater sewer system where Hydrogen Ion ("pH") concentrations were below 5.0 Standard Units ("S.U.") or above 12.5 S.U. For each occurrence, provide the following:

- the date of the sampling event;
- the exact location where samples were taken;
- method(s) used to collect the samples;
- time of sampling event;
- the name of the person(s) collecting the samples;
- the date the analysis was performed;
- the name of the person(s) performing the analysis;

- the analytical techniques/methods used; and
- chain-of-custody form.

e. Specify the date the facility was constructed and the date wastewaters from glass manufacturing operations were first introduced into the municipal wastewater sewer system.

f. The cover letter enclosing the facility's July 15, 2013 DMR for second quarter 2013 regarding non-contact cooling waters states "the project to eliminate flow through Outfall 003, as described in the DMR submitted in January, is underway." Submit a brief description of the project, status/schedule for its completion, and estimated cost.

g. Submit a complete copy of the SPCC Plan being implemented by the facility at the time of EPA's inspection, including all figures, tables, attachments, and appendices, and any amendments or changes since EPA's inspection.

h. By way of an October 16, 2013 correspondence to EPA, the facility listed response actions taken, or expected to be taken following EPA's inspection. Provide the following:

(1) Regarding the drawings provided with the correspondence: the diagrams show wetlands to the west and south, and a buffer zone contour line to the west. Identify the limits and provide the name of wetlands, and (if different) wetlands associated with the buffer zone contour line.

(2) The correspondence addresses EPA's observation of a process wastewater source (contact cooling waters) contributing flow from wet cullet storage piles, see Attachment B-3, photograph 1. Provide the following:

(i) The date the facility first started storing wet cullet piles outside and the date the facility first started storing it in the area in photograph 1, and (if applicable) the stop date. Also clearly describe any other outside locations/drainage areas where wet cullet is, or has been, stored.

(ii) Identify the unit operation that generates the wet cullet and drag-out wastewaters.

(iii) The maximum amount of wet cullet (expressed in pounds or cubic yards) stored outside, and the amount stored outside on the day of EPA's inspection.

(iv) Explain, in detail, the changes made or proposed to be made to the location used for wet cullet storage and the reason(s) for the changes. Also, provide a schedule outlining all completed and proposed changes and the estimated or actual total cost(s) for the changes.

(v) The average wastewater drag-out rate from wet cullet storage piles (expressed in gallons of drag-out per pound or cubic yards of wet cullet). Your response may be estimated or actual. If estimated, explain the method for estimating the rate and any assumptions made.

(vi) Provide, if available, analytical wastewater sampling results for wastewaters draining from wet cullet piles.

(vii) Provide a statement that details the direction wastewater flows from the wet cullet storage piles to the nearest wetlands and/or surface waters.

i. Provide the source(s), MSDS and/or other information that details the chemical composition of materials observed and photographed by EPA, see Attachment B-3 for photographs. Also, provide an explanation detailing the direction of wastewater flows to outfalls from the sources to the nearest wetlands and/or surface waters or the sanitary sewer system. Also, if drainage flows from the area(s) have changed, explain the change(s) and provide the date for the change(s).

(1) The material, white and black in color, spilled on the rail road tracks, photograph 2.

(2) Material stockpiled in storage bays, photographs 3 through 5.

(3) The material, red in color, spilled on the floor, and used in a hopper in a cinder block room located next to storage bays, photograph 6.

(4) Material, black and brown in color, spilled around an aggregate conveyor that originates below grade, photograph 7. Describe the direction and ultimate discharge point for drainage wastewater flows, including stormwaters, from locations where water collects and pools below grade to the conveyance system.

(5) Material in an uncovered roll-off container near the batch house, photograph 10. Indicate if the facility, prior to EPA's inspection, routinely stored the material in this area and whether it was uncovered. Also provide the maximum amount of time the material is stored on site and method of disposal.

j. Regarding portable containers (totes) stored outside, photographs 8 and 9: Identify the material(s) stored in the containers and/or provide MSDS, and provide the typical and maximum number of days full containers are stored in this location. Also provide a statement explaining if containers are routinely stored in this location full or partially full of material. Indicate the direction for stormwater flows in the area and the ultimate discharge point/outfall.

k. Regarding drainage waters from secondary containment system for oil storage tanks, photograph 11: Indicate the direction for drainage stormwater flows from the containment area and the ultimate discharge point/outfall. Provide drainage flow records associated with stormwaters drained from the containment area. If records are not available, indicate the reason.

End of questions.